

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, <i>et al.</i>	§ § § § § § § §	Case No. 3:21-cv-00259 [Lead Case]
V.	§ § § § § § § §	
GREG ABBOTT, <i>et al.</i> ,	§ § § § § § § §	
<i>Plaintiffs,</i>	§ § § § § § § §	
<i>Defendants.</i>	§ § § § § § § §	

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**PLAINTIFFS' PRETRIAL DISCLOSURES OF DEPOSITION DESIGNATIONS**

Plaintiffs hereby jointly submit the following designations of deposition testimony pursuant to Federal Rule of Civil Procedure 26(a)(3), and in accordance with the Court's Pretrial Scheduling Order (Dkt. 880) and Order Extending Scheduling Order Deadlines (Dkt. 923). Plaintiffs reserve the right to amend and supplement these deposition designations as appropriate, including but not limited to the right to designate deposition testimony in response to Defendants' deposition designations, as provided for in the Court's Pretrial Scheduling Order and Order Extending Scheduling Order Deadlines.

Plaintiffs' Deposition Designations are set forth in the following attachments:

Exhibit 1: Deposition Designations for Jeffrey Archer, dated September 23, 2022

Exhibit 2: Deposition Designations for Mark Bell, dated July 7, 2022

Exhibit 3: Deposition Designations for Paul Bettencourt, dated July 29, 2022

Exhibit 4: Deposition Designations for Brian Birdwell, dated August 18, 2022

Exhibit 5: Deposition Designations for Bradley Buckley, dated July 18, 2022

Exhibit 6: Deposition Designations for Sharon Carter, dated July 29, 2022

Exhibit 7: Deposition Designations for Adam Foltz, dated July 14, 2022

Exhibit 8: Deposition Designations for Colleen Garcia, dated June 28, 2022

Exhibit 9: Deposition Designations for Chris Gober, dated July 12, 2022

Exhibit 10: Deposition Designations for Ryan Guillen, dated June 29, 2022

Exhibit 11: Deposition Designations for Kelly Hancock, dated June 23, 2022

Exhibit 12: Deposition Designations for Dan Huberty, dated June 30, 2022

Exhibit 13: Deposition Designations for Willie Hudspeth, dated August 24, 2022

Exhibit 14: Deposition Designations for Todd Hunter, dated July 15, 2022

Exhibit 15: Deposition Designations for Todd Hunter, dated October 11, 2022

Exhibit 16: Deposition Designations for Sheila Jackson Lee, dated August 2, 2022

Exhibit 17: Deposition Designations for June Jenkins, dated August 23, 2022

Exhibit 18: Deposition Designations for Jacey Jetton, dated July 13, 2022

Exhibit 19: Deposition Designations for Adam Kincaid, dated November 2, 2023

Exhibit 20: Deposition Designations for Adam Kincaid (as representative of NRRT), dated November 2, 2023

Exhibit 21: Deposition Designations for JM Lozano, dated July 12, 2022

Exhibit 22: Deposition Designations for John Lujan, dated June 23, 2022

Exhibit 23: Deposition Designations for Anne Mackin, dated July 11, 2022

Exhibit 24: Deposition Designations for Andrew Murr, dated June 22, 2022

Exhibit 25: Deposition Designations for Andrew Murr, dated October 12, 2022

Exhibit 26: Deposition Designations for Sean Opperman, dated July 13, 2022

Exhibit 27: Deposition Designations for Hugh Shine, dated July 16, 2022

Exhibit 28: Deposition Designations for Chris Turner, dated January 14, 2022

Exhibit 29: Deposition Designations for Harold Vanarsdale, dated August 24, 2022

Exhibit 30: Deposition Designations for Milton Lee, dated January 20, 2023

Plaintiffs incorporate by reference all testimony, both live testimony and testimony made via trial depositions, offered at the Preliminary Injunction hearing that took place from January 25, 2022 to January 28, 2022, and offer that testimony as support in addition to the identified designations.

Plaintiffs reserve the right to (1) rely on any deposition designations identified herein, regardless of the noticing party or parties in attendance at the deposition; (2) rely on any testimony designated by Defendants affirmatively or in response to Plaintiffs' deposition designations; (3) identify additional deposition testimony as impeachment or rebuttal evidence, as permitted by the Court; (4) call a witness by deposition testimony in any order; and (5) not call one or more witnesses identified in these designations.

Plaintiffs' inclusion of deposition testimony in these designations does not constitute either (1) an admission that the witness's testimony would be admissible if proffered by Defendants, or (2) a waiver of any objection(s) to the testimony.

Dated: May 7, 2025

Respectfully submitted,

**For LULAC Plaintiffs:**

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing and attached was served via the Court's electronic filing system on May 7, 2025.

*s/ Lindsey B. Cohan*  
Lindsey B. Cohan